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January 14, 2000

TO:

Internal File

THRU:

Dave Darby, Team Lead -

FROM:

James D. Smith, Reclamation Specialist 559

RE:

Technical Analysis - Geology - of the Pines Tract Significant Revision, Canyon

Fuel Company LLC, SUFCO Mine, ACT/041/002 - SR99D-2

SUMMARY:

The proposed Pines Tract lease significant revision to the SUFCO Mine MRP was received by the Division on July 16, 1999. This significant revision is for the addition of Federal Leases UTU-76195 to the SUFCO Mine permit area. The Division sent a letter to the permittee, Canyon Fuel Company, on September 7, 1999 indicating the Division had determined the amendment to be administratively incomplete: the permittee submitted additional information on October 18, 1999 and the Division determined that with the new information the submittal was Administratively Complete and ready for Technical Analysis by Division personnel.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

GEOLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 784.22; R645-301-623, -301-724.

Analysis:

Changes to the text have been made on pages 6-iii, 6-2, 6-4, 6-5, 6-7 through 6-10, and 6-12 of Chapter 6. The changes are minor and generally either clarify statements already in the MRP or expand statements to include the Pines tract. Four drill logs have been added to Appendix 6-1 and several

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analyses of coal and rock have been added to Appendix 6-2.

Plates 6-3 and 6-4 (geologic cross-sections B-B' and C-C') have been added to show the nature, depth, and thickness of the coal seam to mined and of overlying and underlying strata. The Upper Hiawatha Seam is the only seam minable within the permit boundary (p. 6-7). The revised Plate 6-1, Geology and Drillhole Location Map, includes federal lease UTU-76195 within the permit boundary and shows the locations of the two new cross-sections.

The permittee states that detailed geologic information is in the R2P2 on file with the BLM. The BLM has requested, in a letter to UDOGM dated February 4, 2000, that a new R2P2 be prepared for the Pines tract significant revision. This new R2P2 should be prepared and submitted to UDOGM as part of this Pines Tract Significant Revision.

There is a plugged and abandoned gas well in the Pines tract in Sec 23, T. 21 S., R. 5 E.

Findings:

Information on geologic resources is not considered adequate to meet the requirements of this section.

R645-301-522, -525, -622, The BLM has requested, in a letter to UDOGM dated February 4, 2000, that a new R2P2 be prepared for the Pines tract significant revision. This new R2P2 should be prepared and submitted to UDOGM as part of this Pines Tract Significant Revision.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Coal Resource and Geologic Information Maps

Plates 6-3 and 6-4 (geologic cross-sections B-B' and C-C') have been added. The revised Plate 6-1, Geology and Drillhole Location Map, includes federal lease UTU-76195 within the permit boundary and shows the locations of the two new cross-sections. Detailed geologic information is in the R2P2 on file with the BLM

Revised Plate 5-11 shows overburden isopach thickness for the SUFCO mine area, including the Pines tract. Revised Plate 5-10 shows the limits of anticipated subsidence for the same area.

Plate 5-7 the current MRP shows projected mining through the year 2003. The projected mining

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covers only a small portion of the Pines tract, and this map has not been updated for the Pines tract Significant Revision. The permittee is required to maximize recovery of the coal resource, and also to provide information in sufficient detail to evaluate the subsidence control plan for the entire permit area. The current plate 5-7 is not adequate. Acknowledging that as mining progresses unforseen conditions will most likely necessitate modifications of any long-range plan, Plate 5-7 nevertheless needs to show a plan for projected mining in the entire Pines tract.

Findings:

Information on coal resource and geologic information maps is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

R645-301-522, -525, -622, The permittee needs to show on Plate 5-7, or on another map, a projected plan for mining the entire Pines tract.

RECOMMENDATION

Prior to approval, the permittee must meet the requirements of R645-301-522, R645-301-525.100, R645-301-623.300 as outlined above.

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